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## Tax Litigation and Administration

### TAX LITIGATION AND ADMINISTRATION

Members of the Tax Practice Group are skilled in handling tax controversies, including:

- Representing taxpayers at all levels before the Internal Revenue Service and Florida Department of Revenue in audits, collections, field conferences and administrative appellate proceedings;
- Representing taxpayers before the United States Tax Court, United States District Court, United States Claims Court, Circuit Courts of Appeal and Supreme Court; and

Applying and negotiating with the Internal Revenue Service for private letter rulings and technical advice memoranda and with the Florida Department of Revenue for technical assistance advisements.